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14	UNITED STATES DISTRICT COURT		
15	NORTHERN DISTRICT OF CALIFORNIA		
16	SAN FRANCISCO DIVISION		
17	UNITED STATES OF AMERICA,	NO. CR 16-00227 SI	
18	Plaintiff,	[FILED: January 17, 2017]	
19	v.)		
20	BTC-E, A/K/A CANTON BUSINESS) CORPORATION,)		
21	and		
22	ALEXANDER VINNIK,		
23	Defendants.		
24) 		
25 26			
27			
28	NOTICE OF RELATED CASES		

CR 16-00227 SI; CR 22-00255 VC

1	UNITED STATES OF AMERICA,	NO. CR 22-00255-VC
2	Plaintiff,	[FILED: July 12, 2022]
3 4 5	v. ALEXEI VIKTOROVICH BILUCHENKO, a/k/a "Alexsey Viktorovich Bilyuchenko,") a/k/a "Алексей Викторович Билюченко")	NOTICE OF RELATED CASE IN A CRIMINAL ACTION
)	Defendant.))

The United States of America, pursuant to Local Criminal Rule 8-1, hereby notifies the Court that the two above-captioned criminal cases are related. Both cases involve the same facts and circumstances, and concern in large part similar and collaborative conduct.

A. United States v. Alexander Vinnik, CR 16-00227 SI

On January 17, 2017, a federal grand jury in this district returned a superseding indictment against Defendant Alexander Vinnik. The superseding indictment alleged, among other things, that Vinnik and others directed and supervised the operations and finances of BTC-e, one of the world's largest digital currency exchanges, which operated between around 2011 until it was shut down by law enforcement in or around July 2017. Superseding Indictment ¶ 1. The superseding indictment further alleges that, through Vinnik's efforts, BTC-e emerged as one of the principal means by which cyber criminals around the world laundered the proceeds of their criminal activity. *Id.* ¶ 2.

The superseding indictment charged BTC-e and Vinnik with one count of operation of an unlicensed money service business, in violation of 18 U.S.C. § 1960, and one count of conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h). In addition, the superseding indictment charged Vinnik with seventeen counts of money laundering, in violation of 18 U.S.C. § 1956(a)(1), and two counts of engaging in unlawful monetary transactions, in violation of 18 U.S.C. § 1957.

B. United States v. Alexei Viktorovich Biluchenko, CR 22-00255 VC

On July 12, 2022, a federal grand jury in this district returned a two-count indictment against Defendant Biluchenko, similarly charging him with operation of an unlicensed money service business, in violation of 18 U.S.C. § 1960, and conspiracy to commit money laundering, in violation of 18 U.S.C.

NOTICE OF RELATED CASES CR 16-00227 SI; CR 22-00255 VC

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§ 1956(h). The indictment alleges that Biluchenko worked with Alexander Vinnik and others to operate BTC-e from 2011 until it was shut down by law enforcement in July 2017. Biluchenko Indictment ¶ 2.

C. NOTICE OF RELATED CASES

Local Rule 8-1(a) provides that a new case should be related to an existing case that "is or was pending in this District." Crim. L.R. 8-1(a). This shall be done by filing a "Notice of Related Case in a Criminal Action" with the Judge assigned to the earliest filed action and serving all known parties with a copy of the notice. *Id.* Two cases are related for purposes of this rule if they (1) "concern one or more of the same defendants and the same alleged events, occurrences, transactions or property" or (2) "appear likely to entail substantial duplication of labor if heard by different Judges or might create conflicts and unnecessary expenses if conducted before different Judges." Crim. L.R. 8.1(b).

Based upon these facts, the cases are related within the meaning of Local Rule 8-1(b)(1) because they involve the same alleged events, occurrences, transactions, and property. Furthermore, the cases are related within the meaning of Local Rule 8-1(b)(2) because, if heard by separate judges, the actions likely would involve substantial duplication of labor by the two judges.

Per the requirement of Local Criminal Rule 8-1(c)(4), government counsel states that assignment of these cases to a single judge is likely to conserve judicial resources and promote an efficient determination of each action.

DATED: June 12, 2023 Respectfully submitted,

ISMAIL J. RAMSEY United States Attorney

/s/ CLAUDIA QUIROZ

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